

UNITED STATES DISTRICT COURT

for the

Western District of New York State

____ Division

Case No.

25 CV 6277-W

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ NoTanvir Mahmud Hossain

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-
Deborah A. Haendiges, John Garcia
City of Lackawanna Police, Erie County Correction
Facility, Erie County Court/State Court.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)



COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Tanvir Mahmud Hossain

Street Address

11581 Walden Avenue

City and County

Alden Erie

State and Zip Code

New York 14004

Telephone Number

716-937-5585

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

John Garcia (individual) Erie County Sheriff
City of Lackawanna Police (government agency)

See additional page one for more info

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

Deborah A. Haendiges
 Erie County Judge
 25 Delaware Avenue
 Buffalo, United States, Erie County
 New York 14202
 716-845-9300
 do not know

Defendant No. 2

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

City Lackawanna Police
 Police
 2807 South Park Ave
 Lackawanna United States Erie
 New York
 716-851-4444
 do not know

Defendant No. 3

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

John Garcia
 Erie County Sheriff
 120 W. Eagle Street
 Buffalo Erie
 New York 14202
 Do not know

Defendant No. 4

Name
 Job or Title (if known)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (if known)

ERIE County Correction Facility
 Jail
 11581 Walden Avenue
 Alden ERIE County
 New York 14004
 716-937-5585
 Do not know

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. Amendment #1, Amendment #5 Amendment #8 and the Human rights law of the United States, the Civil rights laws of both the US and State of New York, 6th amendment Speedy trial - 1974 Speedy trial Act.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Tanvir Mahmud Hossain, is a citizen of the State of (name) India / US.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s) Page #1 and also page one of additional page for Complete list. Please See Defendants list**a. If the defendant is an individual**

The defendant, (name) Deborah A. Haendiges, is a citizen of the State of (name) United States. Or is a citizen of (foreign nation) _____.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

I am Seeking 80. million Dollars for lose of income from my Store and the cost of lose of money from my Houses.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

City of Lackawanna Police making racist statements to me calling me names as ~~harassment~~ said Nigger, Camde Jackie, "to people" on 11/5/23 at my home 2807 South Park Ave Lackawanna N.Y. 14218 and in the police car parked on South Park Ave. also while driving on Skie Way Rt. 5 in Car. Erie County Correcion Facility not allowing to preform the things I need to do for my religion, They ~~are~~ violate my rights by the food and lack of, Slip search's, and how cold they keep the cells and dorms, Cause the inmates to get sick. and more things that are in Violation of human rights. → Please See page one-N-2 of additional

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am Seeking 80 million dollars for damages from the following Lackawanna City Police as I stated in Statement of Claim. also they are Harassing my Store and sit in front of it scaerning the people coming in and out last reported me on 5/10/25. Jonh Garcia for not fixing the issues that I have in formed about in many Grievances written to him. my pain and Suffering both mental and physical, The lose of money from my work and not being abel to do so Freely Please See pages one and two of additional

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff



Printed Name of Plaintiff

Tanvir Mahmud Hossain

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

TANVIK Mahmud Hossain

Page One of Additional Page.

Defendant #5: Erie County Court / State court

Street Address: 25 Delaware Avenue

City and County: Buffalo Erie

State and Zip Code: New York 14202

Telephone Number: 716-845-9300

On page 3: II Basis for Jurisdiction

Under what basis for federal Court jurisdiction

I marked both Boxes as I am unsure which apply to my case, I was born in India, I have my green card and have lived in the United States for many years and own a store and many houses, and I'm well on my way to becoming a citizen of the United States. And from my understanding I am protected by the Civil Rights laws, Human rights and the Constitution of the United States of America, the Greatest land in all the world!!

Page One of 5# I. The Parties to this Complaint

Deborah A. Haendiges (individual) working for a Government agency; Job: Erie County Court Judge.

Erie County Correction Facility; Government agency

Erie County Court / State Court; Government agency

Page 4: State of Claim # III

Deborah A. Haendiges on 11-5-2023 to present she has said racist and sexist comments, "You People" Men of your Culture" (I am India) what does she mean? "All men should do jail time". on 11-6-2023 at the Erie County Court house on 25 Delaware Ave Buffalo N.Y. 14202 She placed me in the custody of the Erie County Sheriff's Correctional

(ON BACK) →

She didn't know if I was safe to be on the streets, She placed me ~~in~~ the jail with no trial or due process of telling me the nature of my accusation of crime, I have now been in jail now for 18 months, being deprived of my freedom, without speedy trial or any date for a trial, This Cruel and unusual Punishment, With no end in sight.

John Garcia, is head of the Erie County Sheriff's and he oversees the day to day working of everything having to do with the Correctional facility, He has allowed Cruel and unusual Punishment By how cold they keep the dorms and cells, to my freedom of Religion, and the cleanliness of the facility and the food they make us eat it is unholy.

: Page 4 of 5 # IV Relief

Deborah A. Heendiges please see state of claim, also has caused pain and suffering to myself and my family and great shame, Has unlawfully placed me jail without due process, Has made me feel as if I am ~~less~~ less of a human or from a lesser Race of people (this is wrong) and Her Sexist Comments, Causing me to have stress and can't sleep, there is more. She has also ~~also~~ taken my freedom and I came here to the United States to make a better life for my family and myself. She has taken my dream from me, Also the relations between my wife and I we had wished to have more children, And now I'm ~~unsure~~ unsure if I will be able to do so. Due to the stress and not knowing what will happen from this racist-N-sexist person in power. My sleepless nights

(Next Page) →

TANVIA MOHAMMAD HOSSAIN

PAGE two of Additional Page
from Page 4 # IV Relief

ERIE County Correction Facility Alden

They have violated my human rights by strip searches, by making me use a bathroom with no doors no walls no bathroom paper at times and no soap. Treating me as if I am guilty of a crime, ~~Even~~ Even without Commencement of a trial, or being convicted of a crime, placing me in harms way by people who have murdered and other worse crimes, by not allowing^{me} to follow my religion believes freely. By making me work jobs with out pay and if not done correctly punished. ~~And~~

And the racist comments by inmates and staff.

Stress, pain, Mental, and Medical ~~issues~~ issues from the pain and suffering. And they do not allow me to talk to my family for more than 8 months, and them not knowing where I was:

To the Court Clerk:

Please tell me if did any of the paper work wrong so I may correct it. Also please let me know the next steps, what I need to do next. I would have liked have sent this online, but they do not have computers or allow us to go online here in the Erie County ~~Jail~~ Jail. Also I would like to know if the court can get me a lawyer, due to the fact I am in jail at this time. Thank you for looking into my case.

10000 Hossain 158551

11581 Walden Ave - Alden, New York 14004

Att. Clerks Office
U.S. District Court
2 Niagara Sq.

Buffale New York 14202



US POSTAGE
PITNEY BOWES
ZIP 14202
02 7H
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Correction



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